

Removing the "established business relationship" qualification from the fax regulations makes it difficult for associations to serve its members who have paid dues to the association for specific programs, services and benefits. This new regulation would force associations to obtain the written consent of their own members before transmitting any fax that could be interpreted as commercial in nature. In addition to the core association, many associations, like CTAM, have chapters which are primarily managed by volunteer leaders, not paid association staff. This regulation is burdensome as it would virtually cut off chapters' communicating with their members as they don't have the resources to collect and manage the requisite permissions.